

EXHIBIT “A”

Seigel Law

PROTECTING THE INJURED

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†LLM in Trial Advocacy
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New Jersey as a Civil Trial Attorney
°NJ and NY Bars

December 6, 2017

Lily Transportation Corp.
145 Rosemary Street
Needham, MA 02494

Re: Our Client: Tracey Boyd-McFadden
Date of Loss: 05/28/2016

Dear Sir/Madam:

In connection with the above-captioned matter, enclosed please find Summons and Complaint served upon you for your liability in an automobile accident on May 28, 2016.

Kindly forward these documents to your insurance company so they will defend this action.

Thank you.

Very truly yours,

SEIGEL LAW LLC

By: 
Mark McBratney, Esq.

MM/agm
Encl.

Disinherited Person
Served on Date: 12/14/17
Time: 10:28 AM



— Est. 1976 —

Mark McBratney, Esq.
N.J.I.D. # 043412002
SEIGEL LAW LLC
505 Goffle Road
Ridgewood, New Jersey 07450
Attorney for Plaintiff(s)
(201) 444-4000

TRACEY BOYD-MCFADDEN,

Plaintiff(s)

vs.

JOSEPH METRO CLARK, RYDER
TRUCK RENTAL, LILY
TRANSPORTATION CORPORATION,
IRONCLAD LOGISTICS, LLC, JOHN
DOE 1-5 AND ABC CORP 1-5 (A
PERSON, PERSONS, ENTITY OR
ENTITIES, WHOSE IDENTITY IS
PRESENTLY UNKNOWN),

Defendant(s)

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: BERGEN COUNTY

DOCKET NO. BER-L-8265-17

Civil Action

SUMMONS

From The State of New Jersey, To The Defendant(s) Named Above:

Lily Transportation Corporation

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the clerk of the Superior Court, Hughes Justice Complex, CN 971, Trenton, New Jersey 08625. A filing fee* payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not

eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

/s/ Michelle M. Smith
Michelle M. Smith, Clerk
Superior Court of New Jersey

Dated: December 5, 2017

Name of Defendant to be Served: **Lily Transportation Corporation**

Address of the Defendant: 145 Rosemary Street
Needham, MA 02494

*** \$105.00 For Chancery Division Cases or \$135.00 for Law Division Cases**

MARK MCBRATNEY, ESQ.
N.J. I.D. # 043412002

Seigel Law, LLC
505 Goffle Road,
Ridgewood, NJ 07450
Attorney for Plaintiff(s)
(201) 444-4000

TRACEY BOYD-MCFADDEN,
Plaintiff(s),
vs.

JOSEPH METRO CLARK, RYDER
TRUCK RENTAL, LILY
TRANSPORTATION CORPORATION,
IRONCLAD LOGISTICS, LLC, JOHN
DOE 1-5 and ABC CORP. 1-5 (a
person, persons, entity or
Entities, whose identity is
Presently unknown)

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: BERGEN COUNTY
DOCKET NO. BER-L-

**Civil Action
COMPLAINT**

Defendant(s).

The Plaintiff, TRACEY BOYD-MCFADDEN ("Plaintiff"), residing in Englewood, NJ, by way of Complaint against the Defendants, JOSEPH METRO CLARK, RYDER TRUCK RENTAL, LILLY TRANSPORTATION CORPORATION, IRONCLAD LOGISTICS, LLC, JOHN DOE 1-5 and ABC CORP. 1-5 (a person, persons, entity or entities, whose identity is presently unknown) says:

FIRST COUNT

1. On or about May 28 2016, Plaintiff was operating a motor vehicle on or in the vicinity of the Shoprite parking lot, located in the vicinity of 224 E Route 4 EB, in Paramus, NJ.

2. At the above time and place, the Defendant, JOSEPH METRO CLARK, was the operator of a motor vehicle by, with the consent and permission, expressed or implied, and in his capacity as agent of said Defendant owner, JOSEPH METRO CLARK, RYDER TRUCK RENTAL, LILLY TRANSPORTATION CORPORATION, IRONCLAD LOGISTICS, LLC, JOHN DOE 1-5 and ABC CORP. 1-5 (a person, persons, entity or Entities, whose identity is Presently unknown).

3. At the same time and place, Defendants, JOSEPH METRO CLARK, RYDER TRUCK RENTAL, LILLY TRANSPORTATION CORPORATION, IRONCLAD LOGISTICS, LLC, operated and/or maintained said vehicle carelessly, recklessly, and negligently; failed to keep said vehicle under reasonable and proper control and was otherwise inattentive, so as to cause said vehicle to violently collide with the Plaintiff's vehicle.

4. At the above time and place, the Defendants John Doe 1-5 and ABC Corp. 1-5 (a person, persons, entity or entities, whose identity is presently unknown), failed to properly maintain their vehicle, failed to keep their vehicles under reasonable and proper control and so carelessly, recklessly, and

negligently operated their vehicles so as to cause their vehicle to violently collide with the Plaintiff's vehicle.

5. As a direct and proximate result of the foregoing, the Plaintiff was caused to sustain serious and permanent injuries as more particularly defined and set forth in N.J.S.A. 39:6A-8(a), and has suffered great pain, shock, and mental anguish, and was and still is, incapacitated and will be permanently disabled, and has in the past and will in the future be caused to expend substantial sums of money for medical treatment.

6. The Plaintiff has complied with the requirements of N.J.S.A. 39:6A-8(a). A copy of the Physician's Certificate of Merit is attached hereto.

WHEREFORE, the Plaintiff demands judgment for damages against the Defendants, JOSEPH METRO CLARK, RYDER TRUCK RENTAL, LILLY TRANSPORTATION CORPORATION, IRONCLAD LOGISTICS, LLC, John Doe 1-5 and ABC Corp. ABC 1-5(a person persons, entity or entities, whose identity is presently unknown) jointly and severally, alternatively together with interest and costs of the Suit.

DESIGNATION OF TRIAL COUNSEL

Pursuant to the provisions of R.4:35-4, the Court is advised that Mark McBratney, Esq. is hereby designated as trial counsel.

JURY DEMAND

Plaintiffs hereby demand a Trial by jury as to all issues herein.

CERTIFICATION PURSUANT TO RULE 4:5-1

Pursuant to Rule 4:5-1, the undersigned certifies that the matter in controversy is not the subject of any other action in any Court or of a pending arbitration proceeding.

Dated: December 4, 2017

Seigel Law LLC



Mark McBratney, Esq.
Attorney for Plaintiff

DEMAND FOR INSURANCE INFORMATION

Pursuant to R. 4:10-2(b), Plaintiffs demand confirmation and copies of all insurance agreements applicable to all answering Defendants.

Seigel Law LLC


Mark McBratney, Esq.
Attorney for Plaintiff

Dated: December 4, 2017

DEMAND FOR ANSWERS TO UNIFORM INTERROGATORIES

Pursuant to R. 4:17-1 et seq., Plaintiffs hereby demand that all Defendants provide certified answers to Form C and C(1) interrogatories.

Seigel Law LLC


Mark McBratney, Esq.
Attorney for Plaintiff

Dated: December 4, 2017

DEMAND FOR ANSWERS TO SUPPLEMENTAL INTERROGATORIES

Pursuant to R. 4:17-1 et seq., Plaintiffs hereby demand that all Defendants provide certified answers to the following supplemental interrogatories:

1. Where you were coming from immediately prior to the incident?

2. What was your intended destination when the accident occurred?

3. Did you observe Plaintiff's vehicle at any time prior to the collision? If yes, state: (a) the approximate speed of each vehicle; (b) where your vehicle was when you first observed Plaintiff's vehicle; (c) the distance between you and Plaintiff's vehicle at the first moment you observed Plaintiff's vehicle and (d) the amount of time that passed from the time of your first observation of Plaintiff's vehicle to the time of the impact.

4. Had ever been in the area of the incident prior to the date referenced above? If yes, state when was the last time you were in the area and the frequency with which you were in the area in the past.

5. How many impacts was your vehicle involved with?

6. Did you observe any prior impacts before your vehicle collided with another vehicle?

7. Do you attribute fault for the accident to any other parties or non-parties and if so, explain your answer.

Seigel Law LLC


Mark McBratney, Esq.
Attorney for Plaintiff

Dated: December 4, 2017

DEMAND FOR PRODUCTION OF DOCUMENTS

Pursuant to R. 4:18-1, et seq., Plaintiffs hereby demand that all Defendants provide the following documents:

1. Any and all statements or reports made by any person or governmental entity concerning this civil action or its subject matter.
2. Copies of any and all photographs or videos in your possession of the vehicles, the location, or the parties involved in this accident.
3. Copies of any and all repairs estimates of the vehicles involved in this accident.
4. Copies of any claims information bureau or other insurance claims searches or other documents referencing any prior or subsequent injuries and/or claims by Plaintiff.
5. Copies of any oral or written statements made by any person with regard to the happening of the collision or having to do with the subject matter of this action.
6. Copies of any and all expert reports, reports of diagnostic tests, hospital and medical records, X-rays, CAT scan films, MRI films and any other films and bills relating to any condition or injury sustained by Plaintiff.
7. Copies of all written reports or summaries of oral reports of all expert or treating or examining physicians along with their curriculum vitae.
8. Copies of any and all books, treatises, commentaries, reports, statutes, codes, ordinances, rules, regulations or other published documents referred to, utilized by or relied upon by any expert witness whom plaintiff/defendant intends to call at the time of trial.
9. Copies of any and all documents, reports, correspondence, blue prints, charts, diagrams, drawings, graphs, maps, plats, plans, photographs, models or other visual reproductions of any object, place or thing prepared or utilized by, referred to or relied upon by any expert witnesses, whether or not you intend on calling them at the time of trial.

10. Copies of any and all photographs, diagrams, charts, drawings, maps, plans or models or other visual reproductions of any object, place or thing related to this litigation.

Seigel Law LLC



Mark McBratney, Esq.
Attorney for Plaintiff

Dated: December 4, 2017